

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA,	:	
	:	
Plaintiff,	:	
	:	
v.	:	19 Cr. 602 (RA)
	:	
MICHAEL HILD,	:	
	:	
Defendant.	:	
	:	

DEFENSE’S REQUEST TO CHARGE

The defense has reviewed the jury instructions proposed by the government (in its Government’s Request to Charge, recently filed of record). Preliminarily, the defense has no material objections to the jury instructions proposed by the government. The defense respectfully reserves the right to propose other modifications, additions, or deletions to the proposed jury instructions at the conclusion of the proof at trial, as warranted by the proof.

Respectfully submitted,

s/ Benjamin. G Dusing
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Counsel for Michael Hild

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 15th day of March, 2021, I electronically filed the foregoing document with the Clerk of the Court using the CM/ECF system, which will serve a notice of electronic filing on the following:

Jordan Estes

Assistant United States Attorney

Scott Hartman

Assistant United States Attorney

/s/ Benjamin G. Dusing
Benjamin G. Dusing